



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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MEMORANDUM

TO: The Commission

FROM: Anthony Herman
General Counsel

Kathleen Guith
Acting Associate General Counsel for Enforcement

BY: Peter G. Blumberg *PGB*
Assistant General Counsel

Ana J. Peña-Wallace *APW*
Attorney

SUBJECT: MUR 6504 (William E. Gardner and Wisconsin & Southern Railroad)

RE: Pre-Probable Cause Conciliation Agreement

Attached is a conciliation agreement signed by counsel for William E. Gardner and Wisconsin & Southern Railroad Co. ("WSOR") that we recommend the Commission accept. See Attachment 1. The agreement would settle violations of 2 U.S.C. §§ 441a(a)(1)(A), 441b and 441f in connection with contributions reimbursed using corporate funds and personal funds totaling \$4,800.

The agreement recites the pertinent facts of this matter and contains admissions to violations of the Act, as well as an agreement to cease and desist from further violations. In addition, Respondents agree to pay a civil penalty of \$8,500, [redacted]

We believe that the negotiated civil penalty amount represents a reasonable compromise in settlement of this matter. Therefore, we recommend that the Commission accept the signed conciliation agreement, approve the appropriate letters, and close the file.

RECOMMENDATIONS:

1. Accept the signed conciliation agreement;
2. Approve the appropriate letters; and
3. Close the file.

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